## REMARKS

Claims 1, 8, and 12 have been amended.  No claims have been canceled.  No new claims have been added.  Claims 1-20 are pending.

### A.　　　REQUEST FOR INTERVIEW

**In response to a telephonic request for an Examiner's Interview, the undersigned was informed that the policy of the Art Unit is to not grant requests for interview when the application is under final rejection.  The Examiner suggested that an Request for Continued Examination (RCE) could be filed to return the application to non-final status and an interview can be granted at that time. Accordingly, this amendment is being concurrently filed with a RCE and the Examiner is requested to contact the undersigned to arrange for an interview prior to responding to the instant Amendment.**

### B.　　　THE OUTSTANDING OFFICE ACTION

Claims 1-4 and 6-20 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Gabbita (U.S. Patent No. 6,349,238).  Claim 5 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Gabbita.  These rejections are respectfully traversed.

Claims 1, 8, and 12 recite, *inter alia*, "wherein said workflow process management application ... permits a user to:  enter, for each department, a workflow plan for said department, receive a workflow performed by said organization, and create a report comparing said workflow plan with said workflow performed."

10

Gabbita is directed to a system for managing workflow in a telecommunications company. As illustrated, for example, in Fig. 1C, the telecommunications company must complete several steps to complete the sale of a service to a customer. In particular, the telecommunications company must ensure that different portions (e.g., order entry, provisioning, translations, field operations, and order coordination) of the company work in cooperation to ensure that the service can be activated by the promised date. See column 6, lines 43-51.

Fig. 2 illustrates a system for executing a workflow application. The workflow application accepts orders for new service submitted by a sales force (step 204). The system selects an appropriate work plan (step 206), and schedules and monitors the work (steps 207-210).

Each work plan is created before the system begins to accept orders, and is stored on a database. Each work plan identifies a series of steps and associated resources required to carry out the work specified in the work plan. See column 9, line 13-29. As noted by the Office Action, the database includes a field for identifying a department associated with a resource. Column 28, line 28. However, the portion of the specification cited by the Office Action merely discloses that Gabbita's database includes a field for associating a user with a department. Gabbita does not disclose that workflow is planned on a department-by-department basis. Indeed, Gabbita teaches away from the claimed invention because each work plan describes each step required to perform work without regard to any particular department. Gabbita therefore, cannot be fairly stated to disclose or suggest "wherein said workflow process management application, when executed by said computer, permits a user to: enter, for each department, a workflow plan for said department, receive a workflow performed by departments of said organization, and create a report comparing said workflow plan with said workflow performed" as recited by independent claims 1, 8, and 12.

Further, Gabbita's system receives as its input orders generated by the sales force and schedules work related to each received order to ensure that as many orders as possible are completed by the required date. By contrast, the present invention is directed to setting, for each department of an organization, a planned workflow, and then comparing the planned worked with the actual workflow. "Workflow" entails more than just orders received from a sales force. In particular, "workflow" refers to both work which must be performed as well as resources required to performed the work. Gabbita's system, beyond setting up the database and permitting the database to be maintained from time to time, does not receive resource information. Accordingly, this and additional reason why Gabbita fails to disclose or suggest the above quoted portions of independent claims 1, 8, and 12.

Claim 1, 8, and 12 are believed to be allowable over the prior art of record. Depending claims 2-7, 9-11, and 13-20 are believed to be allowable for at least the same reasons as the independent claims.

In view of the above amendment, applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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